

# EXHIBIT 2

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| <p style="text-align: center;">1</p> <p style="text-align: center;">IN THE UNITED STATES DISTRICT COURT<br/>FOR THE DISTRICT OF WYOMING</p> <p style="text-align: center;">---</p> <p>ALODIE GOODEN, as )<br/>Wrongful Death )<br/>Representative of )<br/>TANYA GOODEN and ) CASE NO. 15-CV-45-S<br/>CAMERON GOODEN, )<br/>Plaintiff, ) VIDEOTAPED DEPOSITION<br/>vs. ) OF BRIAN J. QUEISER<br/>BRIDGESTONE AMERICAS ) TAKEN 7/24/2015<br/>TIRE OPERATIONS, LLC; )<br/>FEDEX GROUND PACKAGE )<br/>SYSTEM, INC.; and JOHN )<br/>DOE )<br/>CORPORATION/ENTITIES )<br/>1-3, )<br/>Defendants. )</p> <p style="text-align: center;">---</p> <p>GINA CUBILLOS, as )<br/>Wrongful Death )<br/>Representative of the )<br/>ESTATE OF JAMES EDNIE, ) CASE NO. 15-CV-50-S<br/>Plaintiff, )<br/>vs. )</p>   | <p style="text-align: center;">3</p> <p>2015, commencing at 8:00 o'clock a.m.</p> <p style="text-align: center;">---</p> <p><b>APPEARANCES:</b></p> <p>On Behalf of the Plaintiff Alodie Gooden:<br/>THE FITZGERALD LAW FIRM<br/>BY: James E. Fitzgerald, Attorney at Law<br/>2108 Warren Avenue<br/>Cheyenne, Wyoming 82001<br/>307/634-4000<br/>jim@fitzgeraldlaw.com</p> <p>On Behalf of the Plaintiff Gina Cubillos:<br/>KLINE, McCORKLE &amp; PILGER<br/>BY: Stephen H. Kline, Attorney at Law<br/>P.O. Box 1938<br/>Cheyenne, Wyoming 82003<br/>307/778-7056<br/>steve@kmlaw.net</p>   |
| <p style="text-align: center;">2</p> <p>BRIDGESTONE AMERICAS )<br/>TIRE OPERATIONS, LLC )<br/>f/k/a )<br/>BRIDGESTONE/FIRESTONE )<br/>NORTH AMERICAN TIRE, )<br/>LLC; BRIDGESTONE )<br/>AMERICAS, INC.; )<br/>BRIDGESTONE RETAIL )<br/>OPERATIONS, LLC; FEDEX )<br/>GROUND PACKAGE SYSTEM, )<br/>INC., and JOHN DOE )<br/>CORPORATIONS/ENTITIES )<br/>1-3, )<br/>Defendants. )</p> <p style="text-align: center;">---</p> <p>Videotaped deposition of BRIAN J. QUEISER,<br/>a witness herein, called by the Plaintiffs for<br/>Examination pursuant to the Federal Rules of<br/>Civil Procedure, taken before me, the<br/>undersigned, Binnie Purser Martino, a Registered<br/>Diplomate Reporter, Certified Realtime Reporter<br/>and Notary Public in and for the State of Ohio,<br/>pursuant to Notice and agreement of counsel at<br/>the Sheraton Suites, 1989 Front Street, Cuyahoga<br/>Falls, Ohio, on Friday, the 24th day of July,</p> | <p style="text-align: center;">4</p> <p><b>APPEARANCES (Continued):</b></p> <p>On Behalf of the Defendants Bridgestone<br/>Americas Tire Operations, LLC f/k/a<br/>Bridgestone/Firestone North American Tire,<br/>LLC; Bridgestone Americas, Inc. And<br/>Bridgestone Retail Operations, LLC:<br/>HOLLAND &amp; KNIGHT<br/>BY: Colin P. Smith, Attorney at Law<br/>131 S. Dearborn Street<br/>30th Floor<br/>Chicago, Illinois 60603<br/>312/263-3600<br/>colin.smith@hklaw.com</p> <p>On Behalf of Defendant FedEx Ground Package<br/>System, Inc., via telephone:<br/>MURANE &amp; BOSTWICK, LLC<br/>BY: Loyd E. Smith, Attorney at Law<br/>508 W. 27th Street<br/>Cheyenne, Wyoming 82001<br/>307/634-7500<br/>les@murane.com</p> <p><b>ALSO PRESENT:</b><br/>Jimmy Torok, Videographer</p> |

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| <p style="text-align: right;">5</p> <p style="text-align: center;">INDEX</p> <p>1</p> <p>2</p> <p>3</p> <p>4 EXAMINATION (BY MR. FITZGERALD) 6</p> <p>5 EXAMINATION (BY MR. KLINE) 164</p> <p>6 EXAMINATION (BY MR. LOYD SMITH) 185</p> <p>7 FURTHER EXAMINATION 188</p> <p>8 (BY MR. FITZGERALD)</p> <p>9</p> <p>10</p> <p>11 Plaintiff's Exhibit 1 6</p> <p>12 Plaintiff's Exhibits 2 and 3 8</p> <p>13 Plaintiff's Exhibit 4 20</p> <p>14 Plaintiff's Exhibit 5 78</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>   | <p style="text-align: right;">7</p> <p>1 A. Yes.</p> <p>2 Q. What did you do to prepare for this</p> <p>3 deposition?</p> <p>4 A. In the last couple of days, I have met with</p> <p>5 Mr. Smith either on the phone or in person, met</p> <p>6 with some other personnel of the Bridgestone</p> <p>7 Americas Law Department, and an individual</p> <p>8 from -- by phone, an individual from one of our</p> <p>9 factories.</p> <p>10 Q. Okay. Did you review any documents?</p> <p>11 A. I did. I reviewed this notice that you</p> <p>12 marked here.</p> <p>13 Q. It is Exhibit 1?</p> <p>14 A. Right. And it has some attachments that I</p> <p>15 also looked at. And I looked at some documents</p> <p>16 that were produced to you in the last couple of</p> <p>17 days.</p> <p>18 Q. Okay.</p> <p>19 A. That is really about it, frankly.</p> <p>20 Q. All right. So our first question -- and I</p> <p>21 need to tell you that we will do our best to go</p> <p>22 more or less in order.</p> <p>23 A. Okay.</p> <p>24 Q. But I may jump, from time to time, to talk</p> <p>25 about particular topics, which may be spread</p>                                  |
| <p style="text-align: right;">6</p> <p>1 BRIAN J. QUEISER</p> <p>2 of lawful age, a witness herein, having been</p> <p>3 first duly sworn, as hereinafter certified,</p> <p>4 deposed and said as follows:</p> <p>5 EXAMINATION</p> <p>6 (Thereupon, Plaintiff's Exhibit 1</p> <p>7 of the B.J. Queiser deposition</p> <p>8 was marked for purposes of</p> <p>9 identification.)</p> <p>10 THE VIDEOGRAPHER: We are on the</p> <p>11 record.</p> <p>12 BY MR. FITZGERALD:</p> <p>13 Q. Please give us your name.</p> <p>14 A. Hi. It is Brian J. Queiser.</p> <p>15 Q. How are you employed?</p> <p>16 A. An engineer for Bridgestone Americas,</p> <p>17 Incorporated.</p> <p>18 Q. What kind of engineer?</p> <p>19 A. I am Director of Product Analysis</p> <p>20 Department. I am essentially a mechanical</p> <p>21 engineer or a tire engineer.</p> <p>22 Q. Okay. Well, this is the deposition of</p> <p>23 Bridgestone Americas Tire Operations pursuant to</p> <p>24 Rule 30(b)(6). And have you given a 30(b)(6)</p> <p>25 deposition before?</p> | <p style="text-align: right;">8</p> <p>1 over a number of paragraphs.</p> <p>2 A. Sure.</p> <p>3 Q. Okay. So this Commercial Tire invoice,</p> <p>4 actually, there are two of them. And we will</p> <p>5 mark one of these as 2 and the next one as 3.</p> <p>6 (Thereupon, Plaintiff's Exhibits 2</p> <p>7 and 3 of the B.J. Queiser deposition</p> <p>8 were marked for purposes of</p> <p>9 identification.)</p> <p>10 BY MR. FITZGERALD:</p> <p>11 Q. For Number 2, let me direct your attention</p> <p>12 to where it says unit number. What is the unit</p> <p>13 number you are seeing there?</p> <p>14 MR. LOYD SMITH: Jim, this is Loyd.</p> <p>15 Could you give us a Bates number or something to</p> <p>16 refer to?</p> <p>17 MR. FITZGERALD: It is a Commercial</p> <p>18 Tire invoice. I was just going to have him</p> <p>19 identify the unit number and then we will all be</p> <p>20 able to tell. And I will give you whatever more</p> <p>21 information you need as soon as we have that.</p> <p>22 MR. LOYD SMITH: Thank you.</p> <p>23 BY MR. FITZGERALD:</p> <p>24 Q. Do you see the unit number there?</p> <p>25 A. I am looking at number 2?</p> |

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| <p style="text-align: right;">169</p> <p>1 individual tires are not traceable through the</p> <p>2 chain of distribution.</p> <p>3 If it ping-pongs off of three or four</p> <p>4 distributors, before it gets to them, we would</p> <p>5 never know that.</p> <p>6 Q. And you might get it back at the end of its</p> <p>7 life for some kind of recycling. But other than</p> <p>8 that, you might never --</p> <p>9 A. We don't -- sorry.</p> <p>10 Q. Go ahead.</p> <p>11 A. We don't do that ourselves. We promote</p> <p>12 that. We promote sustainable, you know,</p> <p>13 reasonable reuse of our product.</p> <p>14 If it is getting recycled or otherwise</p> <p>15 reused, that tends to be done by third parties</p> <p>16 who are in that business.</p> <p>17 Q. Does Bridgestone do retreading?</p> <p>18 A. Bridgestone has a retread manufacturer, we</p> <p>19 make retread materials. And Bridgestone</p> <p>20 Americas does have a Commercial Tire servicing</p> <p>21 entity called GCR that -- it is essentially, I</p> <p>22 don't want to assume too much, but it is</p> <p>23 essentially like Commercial Tire, where they</p> <p>24 sell and service tires and vehicles and GCR</p> <p>25 entities do retreading.</p>  | <p style="text-align: right;">171</p> <p>1 timely fashion.</p> <p>2 And when we accumulate that information in</p> <p>3 our database, we utilize it to monitor how it is</p> <p>4 doing. That includes all kinds of things, like</p> <p>5 how it looks, how it rides, how it wears and</p> <p>6 whether it fails and why it fails, or what types</p> <p>7 of failure modes there are.</p> <p>8 Q. So there is a number of different search</p> <p>9 categories you can enter to get a product defect</p> <p>10 kind of a response?</p> <p>11 A. I wouldn't call these defects. I mean, it</p> <p>12 is very common for tires to fail in use, I hate</p> <p>13 to say it. It is actually increasingly less</p> <p>14 common, but nonetheless, tire failures in the</p> <p>15 field occur on every product. Everybody, every</p> <p>16 tire is subject to use and misuse and damage and</p> <p>17 things of that nature that cause tire failures,</p> <p>18 including tread/belt detachments. That is a</p> <p>19 common failure mode. It doesn't occur to</p> <p>20 every -- it doesn't occur all that much, it</p> <p>21 occurs less and less and less as time has gone</p> <p>22 on, as products, both tires and the vehicles and</p> <p>23 the drivers and the roads have all matured over</p> <p>24 the last decades. But nonetheless, it is a</p> <p>25 common failure mode. But that is why we monitor</p> |
| <p style="text-align: right;">170</p> <p>1 Q. So if a claim is made, and let's say, using</p> <p>2 a hypothetical, there is more than one tire with</p> <p>3 the same kind of problem, or more than one</p> <p>4 client that brings back a tire with a specific</p> <p>5 problem, how does -- what records are there that</p> <p>6 Bridgestone has that assimilates those types of</p> <p>7 problems, you know, makes it so that you know</p> <p>8 that there is a problem with a batch or --</p> <p>9 A. Okay. Well, that is a good question. But</p> <p>10 we have already talked about the essence of it.</p> <p>11 Data that comes back to us, that we consider</p> <p>12 product performance information or data,</p> <p>13 includes adjustments, claims and lawsuit</p> <p>14 information.</p> <p>15 So adjustment data, we consider that to be</p> <p>16 a free -- in fact, it is really the tire</p> <p>17 industry considers that historically to be sort</p> <p>18 of the pulse of the product in the field.</p> <p>19 Because adjustments are generated by real world</p> <p>20 use, and they flow back to tire manufacturers on</p> <p>21 a fairly time, I want to say, in a timely</p> <p>22 fashion.</p> <p>23 People make requests for an adjustment, we</p> <p>24 get that tire, or lay eyes on it, hands on it</p> <p>25 and enter it into our database in a fairly</p> | <p style="text-align: right;">172</p> <p>1 it, though, that is why we monitor all of our</p> <p>2 returns.</p> <p>3 Q. Is there a title of whoever it is who</p> <p>4 monitors that?</p> <p>5 A. No. It is a responsibility of the</p> <p>6 Corporate Quality Assurance Department, division</p> <p>7 or department. A number of people are part of</p> <p>8 that process.</p> <p>9 Q. So let me use a hypothetical here. I am</p> <p>10 assuming that these tires have a speed rating</p> <p>11 beyond which they shouldn't be driven for any</p> <p>12 length of time?</p> <p>13 A. We have a recommended speed capability for</p> <p>14 it, yes.</p> <p>15 Q. Okay. Let's take the R283. Can you tell</p> <p>16 me what that is?</p> <p>17 A. I believe it is 75 miles an hour.</p> <p>18 Q. So if a tire comes back to you with some</p> <p>19 kind of a claim or adjustment request, and</p> <p>20 somebody eyeballs it and determines maybe that</p> <p>21 the problem with the tire was that it was driven</p> <p>22 too fast over a period of time --</p> <p>23 A. Okay.</p> <p>24 Q. -- how would you, how would I request the</p> <p>25 kind -- those kinds of records, that</p>  |

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# CERTIFICATE

STATE OF OHIO, )

) SS:

SUMMIT COUNTY, )

I, **Binnie Purser Marino**, a Registered  
Diplomate Reporter, Certified Realtime Reporter  
and Notary Public within and for the State of  
Ohio, duly commissioned and qualified, do hereby  
certify that the within-named witness, **BRIAN J.  
QUEISER**, was by me first duly sworn to testify  
the truth, the whole truth and nothing but  
the truth in the cause aforesaid; that the testimony  
then given by him was by me reduced to Stenotype  
in the presence of said witness, afterwards  
prepared and produced by means of Computer-Aided  
Transcription and that the foregoing is a true  
and correct transcript of the testimony so given  
by him as aforesaid.

I do further certify that this deposition was taken at the time and place in the foregoing caption specified, and was completed without adjournment.

I do further certify that I am not a relative, employee of or attorney for any party or counsel, or otherwise financially interested in this action.

I do further certify that I am not, nor is the court reporting firm with which I am affiliated, under a contract as defined in Civil Rule 28(D).

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal of office at Akron, Ohio on this 29th day of July, 2015.

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Binnie Purser Martino, RDR, CRR

My commission expires June 25, 2019.